

The JS 44 civil cover sheet and the information herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

William Bell

(b) County of Residence of First Listed Plaintiff Delaware
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Law Office of Patrick Flanigan, Patrick Flanigan, P.O. Box 2,
Swarthmore, PA 19081-0042 Tel: (484) 904-7795

DEFENDANTS

Dunwoody Village, Anne McNally, Natalie Alsis, Brian Worthington,
Wes Kuehnle

County of Residence of First Listed Defendant Delaware
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity
(Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input checked="" type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
29 USC 2601 et seq

Brief description of cause:
Interference and retaliation under FMLA

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$
150,000.00

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE
November 24, 2014

SIGNATURE OF ATTORNEY OF RECORD
/s/Patrick Flanigan

Patrick Flanigan

NOV 24 2014

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

FOR THE UNITED STATES DISTRICT COURT OF PENNSYLVANIA — DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to an appropriate calendar.

Address of Plaintiff: 216 Tribet Place, Colwyn, PA 19023-3120
 Address of Defendant: 3500 West Chester Pike, Newtown Square, PA 19073-4168
 Place of Accident, Incident or Transaction: Address of Defendant
 (Use Reverse Side For Additional Space)

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?
 (Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 7.1(a)) Yes ☐ No ☒

Does this case involve multidistrict litigation possibilities? Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
 Yes ☐ No ☒
4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?
 Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases:

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☒ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases
 (Please specify) FMLA 29 USC 2601 et seq.

B. Diversity Jurisdiction Cases:

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability — Asbestos
9. ☐ All other Diversity Cases

(Please specify) _____

ARBITRATION CERTIFICATION

(Check Appropriate Category)

I, Patrick Flanigan, counsel of record do hereby certify:

☒ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;

☒ Relief other than monetary damages is sought.

DATE: 11/24/14 Patrick Flanigan
 Attorney-at-Law

92794
 Attorney I.D.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

NOV 24 2014

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 11/24/14 Patrick Flanigan
 Attorney-at-Law

92794
 Attorney I.D.#

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

William Bell

CIVIL ACTION

Dunwoody Village, ^{v.} et al.

14 6715

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

Nov. 24, 2014
Date

Patrick Flanagan
Attorney-at-law

William Bell
Attorney for

(484) 904-7795

Telephone

None

FAX Number

Pate@lawofficept.com

E-Mail Address

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

JURY TRIAL DEMANDED

William Bell (Plaintiff), alleges violations of and seeks redress of all rights and privileges pursuant to the Family and Medical Leave Act, as amended 2008 (FMLA), 29 U.S.C. §§ 2601 *et seq.* The Plaintiff avers, through Patrick Flanigan, Esquire from the Law Office of Patrick Flanigan, as follows:

II. PARTIES

1. William Bell (Plaintiff) is an adult individual who currently resides at 216 Tribet Place, Colwyn, PA 19023-3120. At all times material hereto, Plaintiff was a citizen of the United States, resided in the Commonwealth of Pennsylvania and an employee of Defendant Dunwoody Village.
2. Defendant Dunwoody Village (Defendant Dunwoody) is a name for an entity maintaining an office and conducting business at 3500 West Chester Pike, Newton Square, PA 19073-4168 and, at all times material hereto, also transacted business in Delaware County, Pennsylvania and employed Plaintiff.
3. Defendant Anne McNally (Defendant McNally) is an adult individual, who maintained an office and conducted business c/o Defendant Dunwoody and, at all times material hereto, transacted business in Delaware County, Pennsylvania and was in a supervisory position as the human resources director over the Plaintiff on behalf of Defendant Dunwoody. Plaintiff further believes that Defendant McNally is a citizen and domiciled in the Commonwealth of Pennsylvania.
4. Defendant Natalie Alsis (Defendant Alsis) is an adult individual, who maintained an office and conducted business c/o Defendant Dunwoody and, at all times material hereto, transacted business in Delaware County, Pennsylvania and was in a supervisory position in the human resources department over the Plaintiff on behalf of Defendant Dunwoody. Plaintiff further believes that Defendant Alsis is a citizen and domiciled in the Commonwealth of Pennsylvania.
5. Defendant Brian Worthington (Defendant Worthington) is an adult individual, who at all times material hereto was Plaintiff's direct supervisor and a servant, agent or employee

on behalf of Defendant Dunwoody. Plaintiff further believes that Defendant Worthington is a citizen and domiciled in the Commonwealth of Pennsylvania.

6. Defendant Wes Kuehnle (Defendant Kuehnle) is an adult individual; who at all times material hereto was head of maintenance department and a servant, agent or employee on behalf of Defendant Dunwoody. Plaintiff further believes that Defendant Kuehnle is a citizen and domiciled in the Commonwealth of Pennsylvania.

III. JURISDICTION AND VENUE

7. The above mentioned paragraphs are incorporated as if set forth more fully herein.
8. Jurisdiction is conferred upon this Honorable Court by 28 U.S.C. § 1337 relating to "any civil action or proceeding arising out of any act of Congress regulating commerce," 28 U.S.C. § 1343(4), and 28 U.S.C. § 1331. This action is authorized and instituted pursuant to the Family and Medical Leave Act (FMLA), 29 U.S.C. §§ 2601 et seq.
9. Plaintiff obtains jurisdiction because the demand is in excess of One Hundred Fifty Thousand Dollars (\$150,000.00) or as a federal question matter, or both.
10. Venue is appropriately laid in the United States District Court for the Eastern District of Pennsylvania, pursuant to 28 U.S.C. § 1391(b), because all parties regularly conduct business within this district and the acts complained of by Plaintiff arose therein.

IV. BACKGROUND FACTS

11. On or about August 7, 2000, Plaintiff was hired by Defendants and, at all times material hereto, Plaintiff was employed as a plumber and was not a union member.
12. For approximately two (2) years from 2012 through 2014 (termination date) Plaintiff's work shift would start at 7:30am ending at 3:30pm, providing Plaintiff 30 minutes to get home and care for his mother, when the at-home care giver would depart for the day.

13. Suddenly and without notice during mid-January 2014, Defendant Kuehnle approached Plaintiff and unilaterally changed Plaintiff's work shift to start at 8:00am and to end at 4:00pm. Further, when Defendant Kuehnle was reminded (because he already knew for about two years) of the scheduling needed for the care Plaintiff's mother, Defendant Kuehnle responded that "Everybody has problems." Plaintiff's reply was that he would make an application under the FMLA.
14. On or about February 1, 2014, Plaintiff submitted an application for FMLA to Defendant McNally, who stated that the completed paperwork should be submitted to Defendant Alsis. Plaintiff complied as instructed and requested an intermittent leave of absence for the serious illness of a parent (Plaintiff's mother).
15. On or about March 13, 2014, the medical certification for the serious medical condition of the mother was submitted by the treating physician.
16. On Thursday, March 13, 2014, Plaintiff spoke with Defendant Alsis, who stated that everything was "OK" with the FMLA application and the 7:30am to 3:30pm schedule was approved. Further, Defendant Alsis stated that she spoke with Defendant Kuehnle, who was informed of the FMLA approval.
17. On Monday, March 17, 2014, Defendants started the FMLA scheduling benefit, which specifically was as it had been for the prior two (2) years as follows:
 - a. Plaintiff's work shift would start at 7:30am through 3:30pm; and
 - b. Plaintiff would be home by 4:00pm, when the in-home care giver for his mother would depart for the day.
18. From March 17 through March 26, 2014 (8 working days) the Defendants provided the FMLA benefit.

19. On March 27, 2014, Plaintiff arrived at work as scheduled at 7:30am, but at about 1:00pm Defendant Worthington told Plaintiff that the FMLA was terminated immediately and the work shift starts at 8:00am the next day.
20. At about 1:15pm on March 27, 2014, Plaintiff told Defendant McNally what was stated by Defendant Worthington. Defendant McNally stated that she did not make the decision to terminate the FMLA benefit.

V. FMLA QUALIFICATIONS

21. Pursuant to 29 U.S.C. § 2611(2)(A) and 29 U.S.C. § 2612(a)(1)(D), Plaintiff was eligible for Family and Medical Leave.
22. At all times material hereto, Plaintiff believes that Defendant Dunwoody had at least 50 employees including volunteers for 20 or more calendar work weeks during the pertinent year or the preceding year within 75 mile radius.
23. Plaintiff was employed for at least 12 months and worked at least 1,250 hours during the 12 months preceding the leave of absence, or Plaintiff was otherwise qualified under the employer's policies.
24. Plaintiff was eligible for FMLA and had been using FMLA in accordance with the work schedule accommodation.

COUNT I

**DISCRIMINATION IN VIOLATION OF
FAMILY AND MEDICAL LEAVE ACT, AS AMENDED 2008, 29 U.S.C. §§ 2601 et seq.**

Discrimination, 29 U.S.C. § 2615(a)(2)

PLAINTIFF V. ALL DEFENDANTS

25. The above-mentioned paragraphs are incorporated as if set forth more fully herein.
26. Plaintiff has statutory rights to be free from discrimination under 29 U.S.C.A. §

2615(a)(2).

27. Defendants' intentionally or as a mixed-motive violated the FMLA as follows:

First: Plaintiff's family member has a protected medical condition.

Second: This medical condition is a "serious health condition," defined in the statute.

Third: Plaintiff gave appropriate notice of the need for FMLA.

Fourth: Plaintiff was terminated.

Fifth: Plaintiff taking the FMLA was a pretext or a motivating factor in Defendants' decision to terminate the Plaintiff.

28. Plaintiff seeks the remedies set forth below in the **WHEREFORE** clause.

COUNT II

RETALIATION IN VIOLATION OF FAMILY AND MEDICAL LEAVE ACT, AS AMENDED 2008, 29 U.S.C. §§ 2601 et seq.

Retaliation, 29 U.S.C. § 2615(b)

PLAINTIFF V. ALL DEFENDANTS

29. The above-mentioned paragraphs are incorporated as if set forth more fully herein.

30. Plaintiff has statutory rights to be free from retaliation under 29 U.S.C.A. § 2615(b).

31. The Plaintiff claims that Defendants' retaliated against him because Plaintiff opposed a practice made unlawful by the Family and Medical Leave Act as follows:

First: Plaintiff filed a complaint with human resources asserting rights under the FMLA.

Second: Plaintiff was subjected to a materially adverse action after the protected conduct was requested and granted.

Third: There was a causal connection between the work scheduling

accommodation, the revocation of the scheduling accommodation,
and the termination.

32. Plaintiff seeks the remedies set forth below in the **WHEREFORE** clause.

VI. WHEREFORE, Plaintiff demands judgment against all Defendants.

- Defendants' acts were willful, wanton, malicious, and oppressive and with reckless disregard for Plaintiff's federally protected rights; therefore, justifying the imposition of punitive damages.
- Plaintiff demands favorable judgment against Defendants for all equitable relief including, but not limited to: reinstatement to job position, full restoration of all leave and health benefits and any additional unpaid leave up to the maximum permitted by the FMLA including, but not limited to, doubling the damages proven inclusive of all wages, salary, employment benefits or other compensation denied or lost.
- Plaintiff further demands favorable judgment for all interest on the monetary benefits calculated at the prevailing rate, an additional amount equal to those sums, as liquated damages under 29 U.S.C.A. § 2617(a)(3), fees and costs including the allowance of reasonable attorney fees, expert witness fees and other costs of the action and such other orders and further relief as may be necessary and appropriate.
- Plaintiff seeks punitive damages plus counsel fees, costs and other relief as deemed appropriate by the Court.

Respectfully submitted,

Date: September 10, 2014.

By:


William Bell, Plaintiff

Date: September 10, 2014.

By: /s/Patrick Flanigan

Patrick Flanigan

Federal Court - Eastern District of PA

E-Signature Validation Code: PFF8163

MSG

Law Office of Patrick Flanigan

Attorney for Plaintiff

By: Patrick Flanigan

PA Attorney No.: 92794

P.O. Box 42, Swarthmore, PA 19081-0042

Tel: (484) 904-7795 Email: Pat@lawofficepf.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (Philadelphia)**

WILLIAM BELL
216 Tribet Place
Colwyn, PA 19023-3120,
Plaintiff,

CIVIL ACTION

v.

NO.: **14 6715**

DUNWOODY VILLAGE
3500 West Chester Pike
Newton Square, PA 19073-4168,
and

JURY TRIAL DEMANDED

ANNE McNALLY
c/o DUNWOODY VILLAGE,
and

NATALIE ALSIS,
c/o DUNWOODY VILLAGE,
and

BRIAN WORTHINGTON
and

WES KUEHNLE,
c/o DUNWOODY VILLAGE,
Defendants.

NOTICE TO PLEAD

You have been sued in court. If you wish to defend against the claims set forth in the following pages. You must take **action within twenty (20) days** after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, THEN GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
ONE READING CENTER
PHILADELPHIA, PENNSYLVANIA, 19107
TELEPHONE: (215) 238-1701**

If you are looking for an attorney in a county listed below, then contact that county bar association's lawyer referral service (LRS) directly.

- Allegheny County, Pittsburgh:
(412) 261-5555
- Beaver County, Beaver:
(724) 728-4888
- Berks County, Reading:
(610) 375-4591
- Blair County, Hollidaysburg:
(814) 693-3090
- Bucks County, Doylestown:
(215) 348-9413,
(800) 991-9922
- Chester County, West Chester:
(610) 429-1500
- Cumberland County, Carlisle:
(717) 249-3166
- Dauphin County, Harrisburg,:
(717) 232-7536
- Delaware County, Media:
(610) 566-6625
- Erie County, Erie:
(814) 459-4411
- Lackawanna County, Scranton:
(570) 969-9600
- Lancaster County, Lancaster:
(717) 393-0737
- Lehigh County, Allentown:
(610) 433-7094
- Luzerne County, Wilkes-Barre:
(570) 822-6029
- Mercer County, Mercer:
(724) 342-3111
- Monroe County, Stroudsburg:
(570) 424-7288
- Montgomery County, Norristown:
(610) 279-9660
- Northampton County, Easton:
(610) 258-6333
- Philadelphia County, Philadelphia:
(215) 238-1701
- Washington County, Washington:
(724) 225-6710
- Westmoreland County, Greensburg:
(724) 834-8490
- York County, York:
(717) 854-8755

William J. Bell
Mr. William J. Bell
216 Tribet Place
Colwyn, PA 19023-3120